

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

**AMERICAN MEDICAL FACILITIES
MANAGEMENT, LLC d/b/a AMFM**

Plaintiff,

v.

**AARON & GIANNA, PLC,
DEWAYNE L. WILLIAMS,
VETCOMM, LLC, TERRY READO,
DERON BROWN
OSTEOBIOLOGIC SOLUTIONS, INC.,
and ROBERT BUNDY**

Defendants.

**Civil Action No. 2:21-cv-00400
Honorable John T. Copenhaver, Jr.**

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO EFFECUATE SERVICE ON
DEFENDANTS, DERON BROWN, TERRY READO, AND VETCOMM, LLC; AND,
MOTION FOR SUBSTITUTED SERVICE OF PROCESS**

COMES NOW, Plaintiff, American Medical Facilities Management, LLC d/b/a AMFM (“AMFM”), by and through counsel, pursuant to Rule 4(m) of the Federal Rules of Civil Procedure and move for a thirty (30) day extension of time to effectuate service of process on Defendants, Deron Brown, Terry Reado, and Vetcomm, LLC and further moves for leave to serve these Defendants, Brown and Vetcomm, LLC via substituted service of process pursuant to Rule 4(e)(1) under the applicable substituted service provisions provided under the laws of the State of Louisiana.¹ In support of its Motion, Plaintiff incorporates by reference, its contemporaneously filed Memorandum in Support of Plaintiff's Motion for Extension of Time to Effectuate Service on Defendants, Deron

¹ Defendant is not seeking to serve Defendant Reado at this time via substituted service.

Brown, Terry Reado, and Vetcomm, LLC; and, Motion for Substituted Service of Process.

In addition, Plaintiff attached the following Exhibits:

1. Exhibit 1 – Affidavit of Service on DeWayne Williams
2. Exhibit 2 – Affidavit of Service on William Aaron as Registered Agent for Aaron & Gianna, PLC
3. Exhibit 3 – Louisiana Secretary of State Business Filings for Vetcomm, LLC
4. Exhibit 4 – Affidavit of Non-Service of Deron Brown in New Orleans, LA
5. Exhibit 5 – Affidavit of Non-Service of Deron Brown and Vetcomm, LLC in Baton Rouge, LA.
6. Exhibit 6 – Affidavit of Deron Brown

WHEREFORE, Plaintiff, for reasons stated herein, respectfully requests an order granting Plaintiff a thirty (30) day extension of time to effectuate service of process on Deron Brown, Terry Reado, and Vetcomm, LLC, an order granting Plaintiff leave to serve the Defendants, Deron Brown and Vetcomm, LLC via substituted service of process pursuant to Rule 4(e)(1) under the applicable substituted service provisions provided under the laws of the State of Louisiana and for any and all other relief the Court deems equitable and just.

**AMERICAN MEDICAL FACILITIES
MANAGEMENT, LLC d/b/a AMFM**

Plaintiff,

By Counsel:

/s/ Mark A. Robinson
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AND

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Plaintiff,

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**AARON & GIANNA, PLC,
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Defendants.

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CERTIFICATE OF SERVICE

Undersigned counsel hereby certifies that it has served a true and correct copy Plaintiff's "***PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO EFFECUATE SERVICE ON DEFENDANTS, DERON BROWN, TERRY READO, AND VETCOMM, LLC; AND, MOTION FOR SUBSTITUTED SERVICE OF PROCESS,***" upon counsel for the parties, as well as parties not represented via the Public Access to Court Electronic Records system and/or via U.S. Mail, postage prepaid on this 1st day of December 2021 upon the following:

Kevin J. Robinson, Esq.
Pullin, Fowler, Flanagan, Brown & Poe, LLC
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*Counsel for Defendants, Aaron & Gianna, PLC,
And DeWayne Williams*

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Terry Reado
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9800 Airline Hwy
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Osteobiologic Solutions, Inc
Agent: Robert Bundy
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The Woodlands, TX 77381
Courtesy copy to:
Ashley French (via email to:
AFrench@c-wlaw.com)

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/s/ Mark A. Robinson

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Matthew Mains, Esquire (WVSB # 11854)